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Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**THIRD SUPPLEMENTAL VERIFIED  
STATEMENT OF CECILY A. DUMAS  
IN SUPPORT OF THE APPLICATION  
OF THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS PURSUANT TO 11  
U.S.C. § 1103 AND FED. R. BANKR. P.  
2014 AND 5002, FOR AN ORDER  
AUTHORIZING RETENTION AND  
EMPLOYMENT OF BAKER &  
HOSTETLER, LLP, EFFECTIVE AS OF  
FEBRUARY 15, 2019**

[Related to Dkt Nos. 935, 1998, 4019]

1 CECILY A. DUMAS, under penalty of perjury, declares:

2 1. I am a partner in the Financial Restructuring Group of Baker & Hostetler, LLP  
3 (“**Baker**” or the “**Firm**”), counsel to the Official Committee of Tort Claimants (the “**Committee**”)  
4 of PG&E Corporation (the “**Holding Company**”) and Pacific Gas and Electric Company (the  
5 “**Utility**,” and collectively with the Holding Company, the “**Debtors**”) in these chapter 11 cases  
6 (the “**Cases**”).

7 2. I submit this Third Supplemental Verified Statement (“**Third Supplemental**  
8 **Statement**”) pursuant to section 1103(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-  
9 1532 (as amended, the “**Bankruptcy Code**”), and Rules 2014 and 5002 of the Federal Rules of  
10 Bankruptcy Procedure (the “**Bankruptcy Rules**”). This Third Supplemental Statement updates  
11 Baker’s disclosures of connections set forth in: (1) *Declaration of Cecily A. Dumas in Support of*  
12 *the Application of the Official Committee of Tort Claimants for an Order Authorizing the Retention*  
13 *and Employment of Baker & Hostetler LLP, effective as of February 15, 2019* (the “**2014**  
14 **Statement**”) (ECF 935); (2) *First Supplemental Verified Statement of Cecily A. Dumas in Support*  
15 *of the Application of the Official Committee of Tort Claimants for an Order Authorizing the*  
16 *Retention and Employment of Baker & Hostetler LLP, effective as of February 15, 2019* (“**First**  
17 **Supplemental Statement**”) (ECF 1998); and (3) *Verified Statement of Cecily A. Dumas in Support*  
18 *of the Application of the Official Committee of Tort Claimants for an Order (i) Confirming the*  
19 *Scope of the Employment of Baker & Hostetler LLP, or Alternatively (ii) Amending the Order*  
20 *Approving the Application of the Official Committee of Tort Claimants for an Order Authorizing*  
21 *the Retention and Employment of Baker & Hostetler LLP, effective as of February 15, 2019*  
22 (“**Second Supplemental Statement**”) (ECF 4019).

23 3. Unless otherwise stated in this Third Supplemental Statement, I have knowledge of  
24 the facts set forth herein and, if called as a witness, I would testify thereto. Certain of the disclosures  
25 set forth herein relate to matters not within my personal knowledge, but rather within the personal  
26 knowledge of other attorneys and employees at Baker and are based on information provided by  
27 them to me.  
28

**Background**

4. On January 29, 2019 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “**Cases**”) in the United States Bankruptcy Court for the Northern District of California (the “**Court**”). On January 31, 2019, the Court entered an order consolidating the Cases for joint administration [ECF 207].

5. The Debtors continue to manage their assets and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in the Cases.

6. On February 15, 2019, the Office of the United States Trustee (“**U.S. Trustee**”) filed an Appointment of the Official Committee of Tort Claimants [ECF 453]. Following the resignation of Richard Heffern from the original committee and the addition of Tommy Wehe, on February 21, 2019, the U.S. Trustee filed the Amended Appointment of the Official Committee of Tort Claimants [ECF 530]. Following the resignation of GER Hospitality, LLC, in its capacity as an individual claimant and Kirk Trostle, on March 24, 2020, the U.S. Trustee filed the Second Amended Appointment of the Official Committee of Tort Claimants [ECF 6503]. The members of the Committee are: (i) Tommy Wehe; (ii) Angelo Loo; (iii) Karen K. Gowins; (iv) Agajanian, Inc.; (v) Susan Slocum; (vi) Samuel Maxwell; (vii) Karen Lockhart; (viii) Wagner Family Wines-Caymus Vineyards; and (ix) Gregory Wilson.

7. The Committee conducted a meeting on February 15, 2019, at which the Committee duly selected Baker as counsel to represent it during the pendency of the Cases. The Court approved Baker’s employment as counsel to the Committee by order dated April 10, 2019 [ECF 1331].

**Supplemental Disclosures**

8. Baker makes the following supplemental disclosures concerning its connections with creditors or other parties in interest in these Cases:

9. The Debtors have identified Burns & McDonnell Engineering Company, Inc. and HMT LLC as vendors in these Cases. Baker partners now represent Burns & McDonnell Engineering Company, Inc. and HMT, LLC in unrelated matters.

10. The Debtors have identified American Modern Home Insurance Company as Litigation Counterparties/Litigation Pending Lawsuits (including threatened litigation). Baker partners now represent American Modern Home Insurance Company in unrelated matters.

11. The Debtors have identified Live Nation c/o Matt Prieshoff and Contra Costa County as Landlords and Parties to Leases. Baker partners now represent Live Nation c/o Matt Prieshoff and Contra Costa County in unrelated matters.

12. The Debtors have retained KPMG, LLP as Information Technology, Risk and Legal Support Consultants. Baker partners now represent the following KPMG-related entities in unrelated matters: KMPG LLP, KMPG SA, KMPG AG, KMPG Abogados, and KPMG Law Rechtsanwaltsgesellschaft.

13. In October 2019, Judge Randall Newsome was appointed as mediator to oversee the reorganization plan in the Debtor's Cases. Judge Newsome has served as a consultant and expert to Baker in connection with Baker's representation of Irving Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC in 2016 and early 2017.

14. The Ad Hoc Group of Subrogation Claimants have identified Sixth Street Partners as holding various interests related to the Debtors. A recently hired Baker partner who represents Sixth Street Partners, now represents Sixth Street Partners in unrelated matters.

**Baker's Disinterestedness**

15. To the best of my knowledge and except as otherwise set forth in my prior declarations and herein, the partners, counsel, associates and employees of Baker: (i) do not have any connection with the Debtors, their known creditors, other known or potential parties in interest, their respective attorneys or accountants or other professionals, the U.S. Trustee for Region 17 or any person employed in the San Francisco office of the U.S. Trustee, or any United States Bankruptcy Judge for the Northern District of California; and (ii) do not represent any other entity having an adverse interest in connection with these Cases.

/s/ Cecily A. Dumas  
Cecily A. Dumas